

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

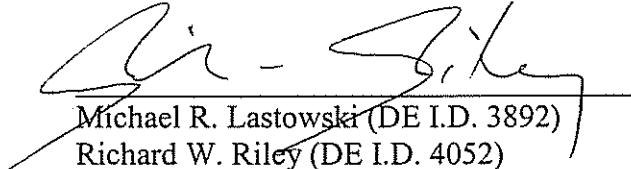
INTEGRATED HEALTH SERVICES OF)	
CLIFF MANOR, INC., INTEGRATED)	
HEALTH SERVICES AT RIVERBEND,)	Civil Action No. 04-910
INTEGRATED HEALTH SERVICES AT)	
SOMERSET VALLEY, INC., ALPINE)	
MANOR, INC., INTEGRATED HEALTH)	
GROUP, INC., SPRING CREEK OF IHS, INC.,)	
FIRELANDS OF IHS, INC., ELM CREEK OF)	
IHS, INC., and IHS LONG TERM CARE)	
SERVICES, INC.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
THCI COMPANY LLC,)	
)	
Defendant,)	
)	
)	

MOTION TO DISMISS AND QUASH

Plaintiffs IHS Long Term Care Services, Inc. and the other plaintiffs, additional counterclaim defendant Abe Briarwood Corporation (“Briarwood”), and two non-parties, Leonard Grunstein (“Grunstein”) and Rubin Schron (“Schron”; and collectively with the Plaintiffs, Briarwood and Grunstein, the “Movants”) hereby move this Court for an order (i) dismissing the Second through Seventh Counterclaims of the Third Amended Counterclaims asserted by defendant, TCHI Company LLC (“THCI”), and (ii) quashing the subpoenae addressed by THCI to non-parties Grunstein and Schron, as well as to another nonparty, Uri Kaufman. In support of this Motion, the Movants submit and rely on the Memorandum of Law in Support of Motion to Dismiss and Quash, the Declaration of Leonard Grunstein, the

Declaration of Rubin Schron, and the Declaration of Amos Alter, Esquire, which have been filed contemporaneously with this Motion.

DUANE MORRIS LLP



Michael R. Lastowski (DE I.D. 3892)

Richard W. Riley (DE I.D. 4052)

1100 North Market Street, Suite 1200
Wilmington, DE 19801-1246

Telephone: (302) 657-4900

Facsimile: (302) 657-4901

E-mail: mlastowski@duanemorris.com
cmwinter@duanemorris.com

-and-

TROUTMAN SANDERS LLP

Amos Alter, Esquire

The Chrysler Building
405 Lexington Avenue
New York, NY 10174

Telephone: (212) 704-6000

Facsimile: (212) 704-6288

E-mail: Amos.Alter@troutmansanders.com

*Attorneys for Plaintiff Integrated Health
Services of Cliff Manor, Inc. et al., Counterclaim
Defendant Abe Briarwood Corp., Leonard
Grunstein and Rubin Schron*